

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

JOSE LUIS TREJO

§
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§
§
§

Cr. No. 7:20-cr-01676-1

**DEFENDANT’S MOTION TO AMEND TERMS AND CONDITIONS OF RELEASE TO
ALLOW DEFENDANT TO TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, **Jose Luis Trejo**, by and through his undersigned counsel and moves this honorable court to amend the terms and conditions of his release on bail to allow him to travel to Las Vegas, NV, and in support thereof would respectfully show:

I.

Defendant is currently set for final pretrial conference on December 3, 2021 and Jury trial on December 7, 2021 before this honorable court. Defendant previously sought, [Doc. No. 33], a bond modification to travel to a medical supply exhibition in Miami, FL from August 29 to September 4, 2021. This new bond modification seeks to add another trip immediately preceding that one, as follows:

II.

Defendant requests permission to travel to Las Vegas, NV while he is out on bond. Defendant would be traveling to the “LAS VEGAS MEDICAL AND

HOSPITAL EQUIPMENT LIVE AUCTION” held in Las Vegas, NV. This is an opportunity for purchasing medical supplies, which form the basis of Defendant’s business as a used medical supply salesman. Defendant only learned of this opportunity earlier this week before filing the motion, and he is requesting the additional days so that he may inspect the equipment in person prior to making bids at auction. Further details regarding the auction can be found at the auctioneer’s website: <https://bid.centurionservice.com/> Defendant would be traveling from August 25, 2021 to August 28, 2021. Defendant would be at 4606 Andrews St. Suite 3, North Las Vegas, NV 89081 and its environs.

III.

Defendant represents to the court that he continues to abide by all the requirements of his release on bail and will be present in court on the date ordered by this honorable court.

IV.

A.U.S.A. Roberto Lopez, Jr., is unopposed.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the honorable court amend his terms and conditions of release to permit him to travel to Las Vegas, NV.

Respectfully submitted,

/s/Alejandro Ballesteros

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Attorneys for Defendant

Jose Luis Trejo

Certificate of Service

On August 19, 2021 this unopposed motion was filed via ECF and served upon Assistant U.S. Attorney, Roberto Lopez.

/s/Alejandro Ballesteros

Alejandro Ballesteros

Certificate of Conference

On August 19, 2021, Assistant U.S. Attorney for the Southern District of Texas, Mr. Roberto Lopez, was consulted and is not opposed to this motion.

/s/Alejandro Ballesteros

Alejandro Ballesteros